

EXHIBIT C



DECLARATION OF THOMAS R. HODGSON

I, Thomas R. Hodgson, make the following statements based upon my own personal knowledge:

1. My name is Thomas R. Hodgson. I served as the President and Chief Operating Officer of Abbott Laboratories ("Abbott") from 1990 to January 1999, when I retired from Abbott. Prior to assuming the position as President and COO, I led the Abbott International division from 1983 to 1990, where the focus of my business was exclusively outside the United States.
2. I have been advised that the Plaintiffs in this lawsuit claim that they require my deposition in order to discover information about the marketing, pricing, and sale of Abbott's drug products; and about any knowledge I might have concerning a Medicare Working Group at Abbott.
3. In my position as President and COO, I was the second-highest ranking officer within Abbott. I was not responsible for the day-to-day oversight of matters such as the pricing, marketing or sale of Abbott's products around the world. Other persons at Abbott had these day-to-day responsibilities, and they advised me as necessary. Even while I was the President and COO of Abbott, therefore, I did not have unique or superior personal knowledge within the company about such matters. Since my retirement from Abbott nearly a decade ago, I have not been involved in any way with the marketing, pricing, or sale of Abbott products.
4. I have never heard of a Medicare Working Group within Abbott, and no such group reported to me about its activities.

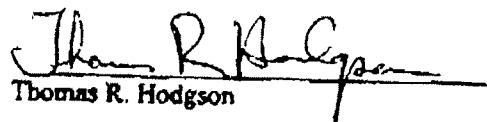
5. I had no responsibility for supervising Abbott's Governmental Affairs group, which coordinates Abbott's lobbying efforts. I do not recall ever participating personally in any lobbying effort on behalf of Abbott.

6. Although I am retired from Abbott, I continue to be active in the business community. I serve as a Director of two public companies -- The Travelers Companies, Inc. (a multi-billion dollar financial and insurance organization) and Idemix Pharmaceuticals, Inc. (a biopharmaceutical company). In addition, I serve on the boards of private companies such as MacLean-Fogg Company (a diverse manufacturing enterprise) and Omniflight Helicopters, Inc. (an organization that specializes in medical transport services). I am also an Executive Advisor of Wind Point Partners (a private equity firm). My current civic activities include serving as a Lifetime Trustee of Rush-Presbyterian St. Luke's Medical Center in Chicago and as a member of the Advisory Board of the Utah Symphony. My work with all of these organizations is important and, particularly with respect to the two public companies, time-consuming.

7. It would impose a substantial burden upon me if I were forced to give a deposition in this matter, particularly given the fact that I have no unique or superior knowledge of any matters relating to this litigation.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 4, 2007.


Thomas R. Hodgson